

Message

From: Willard, Erin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B578218F655C41E29B816A2D0559F4BC-WILLARD, ERIN]
Sent: 11/21/2019 4:38:53 PM
To: Glenda Wehrli [gwehrli@metalico.com]
Subject: RE: Metalico Pittsburgh, Inc.

As requested, this email provides two pieces of information regarding the performance testing completed at other scrap shredding facilities across the United States:

- This link is a case study in Region 5 (Chicago) and includes a scanned copy of the performance test, the protocol for that test and some other relevant documents (click on "Documents" from this main link). Go to <https://www.epa.gov/il/general-iron>
- The following chart is a summary of the stack test emission rates that the EPA has compiled. Because the reports originate in several states, EPA R3 does not hold copies of each report. If you are interested in accessing the individual report for each test, you may need to issue a Freedom of Information Act (FOIA) request to the EPA office(s) assigned to each of the states.

Source of VOC Emission Rate	Date of Test	Ratio of Scrap/Auto	VOC Emission Rate (lbs VOC/hr)	VOC Emission Rate (lbs VOC/ton scrap)	Measured as:
Facility 1 - Ohio	6/5/19	Mix	23.96	0.247	Propane
Facility 2 - Minnesota	8/17/19	Mix	39.55	0.2023	Propane
Facility 3 - Michigan	10/9/19	0/100	41	0.25	Propane
Facility 4 - Wisconsin	6/21/05	0/100	12.78	0.213	?
Facility 5 - California	4/7/19	0/100	57.19	0.1932	Methane
Facility 6 - Massachusetts	11/15/19	0/100	7.47	0.1404	Methane
Facility 7 - Michigan	10/9/19	100/0	22.96	0.14	Propane
Facility 8 - California	4/7/19	100/0	21.5	0.0799	Methane
Facility 9 - Rhode Island	9/17/19	25/75	31.6	0.1008	Propane
Facility 10 - California	4/7/19	50/50	60.92	0.2058	Methane
Facility 11 - Rhode Island	9/17/19	50/50	41.7	0.132	Propane
Facility 12 - Massachusetts	11/15/19	50/50	6.07	0.1284	Methane
Facility 13 - California	2/7/19	50/50	4.1	0.02	Methane
Facility 14 - Wisconsin	6/26/05	50/50	4.2	0.0168	Methane
Facility 15 - California	9/5/19	80/20	13.4	0.0435	?
Facility 16 - Permit Limit - Massachusetts	11/16/19		39	0.25	
Facility 17 - Consent Decree - Massachusetts	9/15/19			0.1	

EPA understands that you will likely want to review this information prior to scheduling a meeting at the EPA office. If you think you can provide a time-frame for your review, we can likely use that to work on a conference date. Additionally, if you think you will be bringing counsel, please let me know as soon as possible so that I can loop our Office of Regional Counsel in for scheduling purposes.

Please let me know if you have any questions.

Erin Willard
Environmental Scientist
US EPA Region III
Air Section
Enforcement & Compliance Assurance Division
US EPA Region 3
1650 Arch Street – 3ED21
Philadelphia, PA 19103
215-814-2152
willard.erinm@epa.gov

CONFIDENTIAL: This transmission may contain deliberative and/or enforcement confidential, attorney-client, or otherwise privileged material. Do not release under FOIA without appropriate review. If you have received this message in error, you are asked to notify the sender and to delete this message.

From: Glenda Wehrli <gwehrli@metalico.com>
Sent: Friday, November 15, 2019 10:28 AM
To: Willard, Erin <Willard.ErinM@epa.gov>
Subject: RE: Metalico Pittsburgh, Inc.

Good Morning Erin,

Thank you for the information.

Can you please provide me with the VOC emissions factor(s) the U.S. EPA referenced in the letter, "performance test data collected from numerous scrap shredding facilities"? It will help me provide you with information during our meeting.

Thanks in advance for your assistance.

Sincerely,
Glenda Wehrli
Director of Environmental Compliance and Employee Safety
Phone: (412) 771-7000 Ext. 205
Cell Phone: (330) 651-3482

From: Willard, Erin <Willard.ErinM@epa.gov>
Sent: Thursday, November 14, 2019 3:52 PM
To: Glenda Wehrli <gwehrli@metalico.com>
Subject: RE: Metalico Pittsburgh, Inc.

Hi –

Typically a NON conference is your opportunity to present information that would assist us in further understanding the issues at the facility, or any info you have that can support claims you may make that refute our assertions.

Having said that, I would expect that in your case, the final course of action is for you to assure compliance with the CAA with a permit that accurately reflects your potential emissions.

If you will be bringing counsel, let me know so that I can schedule our attorney to also be present.

Finally, we can have an in-person meeting at the address below, or, if scheduling and travel funds are tight for you, I can also set up a conference call.

Erin Willard
Environmental Scientist
US EPA Region III
Air Section
Enforcement & Compliance Assurance Division
US EPA Region 3
1650 Arch Street – 3ED21
Philadelphia, PA 19103
215-814-2152
willard.erinm@epa.gov

CONFIDENTIAL: This transmission may contain deliberative and/or enforcement confidential, attorney-client, or otherwise privileged material. Do not release under FOIA without appropriate review. If you have received this message in error, you are asked to notify the sender and to delete this message.

From: Glenda Wehrli <gwehrli@metalico.com>
Sent: Wednesday, November 13, 2019 12:55 PM
To: Willard, Erin <Willard.ErinM@epa.gov>
Subject: RE: Metalico Pittsburgh, Inc.

Good Afternoon Erin,

I am working with the General Manager to get a couple dates for you. Is there a timeframe are you looking at, since the holidays are approaching?

Also, is there an agenda as well as a list of individuals attending the meeting you can provide? I want to make sure I am prepared sine we will be traveling to Philadelphia.

Thanks in advance.

Sincerely,
Glenda Wehrli
Director of Environmental Compliance and Employee Safety
Phone: (412) 771-7000 Ext. 205
Cell Phone: (330) 651-3482

From: Willard, Erin <Willard.ErinM@epa.gov>
Sent: Tuesday, November 12, 2019 11:02 AM
To: Glenda Wehrli <gwehrli@metalico.com>
Subject: RE: Metalico Pittsburgh, Inc.

Hi Glenda,

You have a couple options for a meeting. If you want to come to Philadelphia, we can meet at the EPA office, at the address below. If you are unable to make the trip, we can also sometimes do conference calls.

It may be easier for you to provide us with some dates that work for you, and we'll work from that.

Please let me know what you prefer. Thank you,

Erin Willard
Environmental Scientist
US EPA Region III
Air Section
Enforcement & Compliance Assurance Division
US EPA Region 3
1650 Arch Street – 3ED21
Philadelphia, PA 19103
215-814-2152
willard.erinm@epa.gov

CONFIDENTIAL: This transmission may contain deliberative and/or enforcement confidential, attorney-client, or otherwise privileged material. Do not release under FOIA without appropriate review. If you have received this message in error, you are asked to notify the sender and to delete this message.

From: Glenda Wehrli <gwehrli@metalico.com>
Sent: Monday, November 11, 2019 9:44 AM
To: Willard, Erin <Willard.ErinM@epa.gov>
Subject: Metalico Pittsburgh, Inc.

Good Morning Erin,

Metalico Pittsburgh received the United States Environmental Protection Agency's Notice of Noncompliance / Opportunity to Show Cause letter on Friday November 8, 2019.

I would like to request a meeting to discuss this matter with the EPA. Please send the location and a few dates you would be available.

Sincerely,
Glenda Wehrli
Director of Environmental Compliance and Employee Safety
Phone: (412) 771-7000 Ext. 205
Cell Phone: (330) 651-3482